

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
(EASTERN DIVISION)

Mireille Kotoklo)	
Plaintiff,)	Hon. Joan B. Gottschall
v.)	
)	Magistrate Judge M. David Weisman
Robert Karpinski and DePaul University)	
Defendants.)	No. 20-cv-635
_____)	

Mireille Kotoklo's Motion For Partial Summary Judgment

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Mireille Kotoklo ("Ms. Kotoklo"), respectfully moves for summary judgment on questions of liability on counts IV-VI of her Complaint and Jury Demand, filed at Docket No. 1 in the above captioned case. In support of this motion, Ms. Kotoklo submits a memorandum of law, a state of undisputed facts as required by Rule 56.1 of this Court's Local Rules, and supporting exhibits.

Ms. Kotoklo reserves the right to present all remaining questions (including questions of liability and damages on counts I-III and VII-VIII of her Complaint and Jury Demand, and damages on counts IV-VI) to the jury.

Respectfully submitted,
February 22, 2021

/s/ Fitzgerald T. Bramwell
Fitzgerald T. Bramwell
LAW OFFICES OF FITZGERALD BRAMWELL
255 West Washington, Suite 2200
Chicago, Illinois 60606
312-924-2884 (voice)
bramwell@fitzgeraldbramwell.com

Certificate of Service

The undersigned, an attorney, certifies that on February 22, 2021, he caused the foregoing Mireille Kotoklo's Motion For Partial Summary Judgment to be electronically filed with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. Accordingly, service will be accomplished through CM/ECF on the following counsel of record:

Katherine A. Manuel, Esq.
Joseph T. Charron, Esq.
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
155 North Wacker Drive, Suite 4300
Chicago, Illinois 60606
katherine.manuel@ogletree.com
joseph.charron@ogletreedeakins.com
Counsel for defendants

/s/ Fitzgerald T. Bramwell
Fitzgerald T. Bramwell
LAW OFFICES OF FITZGERALD BRAMWELL
255 West Washington, Suite 2200
Chicago, Illinois 60606
312-924-2884 (voice)
bramwell@fitzgeraldbramwell.com